

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION
DOCKET NO. CV-1:05-cv-11694

ERIC C. PEARCE,)	
)	
Plaintiff)	
)	MOTION TO DISMISS BY DEFENDANTS
v.)	AEGIS HANDMADE CARBON FIBER
)	BICYCLES, LLC, AEGIS RACING BIKES
KEITH BAUMM, et al.,)	USA, LLC, AND FASTBIKES USA, LLC
)	
Defendants.)	

Defendants Aegis Handmade Carbon Fiber Bicycles, LLC (“Aegis Handmade”), Aegis Racing Bikes USA, LLC (“Aegis Racing”), and Fastbikes USA, LLC (“Fastbikes”) (collectively, the “Moving Defendants”), by and through the undersigned counsel, move to dismiss all causes of action asserted against them pursuant to Fed.R.Civ.P. Rule 12(b)(6), for failure to state a claim upon which relief may be granted, and pursuant to Fed.R.Civ.P. Rule 12(b)(2), on the grounds that this court lacks personal jurisdiction over the Moving Defendants.

The Moving Defendants are filing herewith their memorandum in support of this Motion.

WHEREFORE, Defendants Aegis Handmade Carbon Fiber Bicycles, LLC, Aegis Racing Bikes USA, LLC, And Fastbikes USA, LLC request that all causes of action against them be dismissed with prejudice, and that they be awarded the costs of this action, and request such other or further relief as the Court may deem just or appropriate.

REQUEST FOR ORAL ARGUMENT

The Moving Defendants request the opportunity for oral argument with respect to this Motion.

DATED at Portland, Maine this 18th day of July, 2007.

/s/ Paul R. Johnson

Paul R. Johnson, Esq.

BBO # 546165

Attorney for Aegis Handmade Carbon Fiber
Bicycles, LLC, Aegis Racing Bikes USA,
LLC, And Fastbikes USA, LLC

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the following registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants, on this 18th day of July, 2007.

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